



U.S. Department of Agriculture

Personnel Security Bulletin #06-04, Subject: Position Designation Advisory

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Department of
Agriculture

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Issue: Proper position designation is the cornerstone of an effective human reliability program. The attached U.S. Office of Personnel Management (OPM), "For Official Use Only," guidance explains how to designate position risk (public trust) and sensitivity (national security) levels.

Date Issued: February 2, 2006

Effective Date: February 2, 2006

Scope and Effect: This is an internal advisory document for use by USDA personnel involved in position designation.

Supercession: None

Advisory:

1. USDA agency heads are responsible for position designation in their agencies. Program managers and supervisors are responsible for the integrity and efficiency of their programs, and may be delegated the responsibility for position designation. Alternatively, human resources (HR) or other responsible officials may make designations for program managers to review and approve. Designating officials shall have sufficient knowledge of position designation principles and practices. While agencies are strongly encouraged to follow OPM's guidance they are not required to do so. See attached Appendix B, page 1, for a discussion on use of alternative designation models.

2. The majority of USDA positions are properly designated as "Low Risk" (non-public trust), "Non-sensitive" positions. However, following the attacks of 9/11 and increased concerns about possible threats to U.S. agriculture, positions directly involved with (1) farm-to-table food security, (2) harmful pathogens (select agents), (3) protection or administrative operation of mission-critical information technology systems, and (4) protection of critical infrastructure and natural resources shall require moderate or high risk public trust and/or national security sensitivity designations.

3. Executive Order 12968, Access to Classified Information, requires that security clearances:

"...be kept to the minimum required for the conduct of agency functions..." Further, that "eligibility for access to classified information shall only be requested or granted based on a **demonstrated, foreseeable need** for access. Requesting or approving eligibility in excess of actual requirements is prohibited."

As a general rule, if an individual with a security clearance has not had access to classified national security information, materials, or work areas (hereafter, "access") during the last 2 years, a request to terminate the clearance should be initiated, unless there is a current, foreseeable need for access. Exceptions to this general rule are Foreign Service Officers, Office of the Inspector General (OIG) and Forest Service GS-1811 Special Agents, and OIG GS-511 Auditors, and similar positions where access may be periodic, but is clearly foreseeable.

4. If agencies are uncertain about an individual's need for access, e.g., the individual may or may not need access, they should consider concentrating access responsibilities in a supervisory position above that individual, to the extent doing so would not negatively affect program efficiency.
5. If a position does not require access but the incumbent could "...bring about, by virtue of the nature of the position, a material adverse effect on the national security," the position shall be designated as a "No Access" national security position, and the appropriate background investigation scheduled through the Personnel and Document Security Division (PDSD).
6. The 2005-2006 United States Government Manual contains a description of all USDA programs and will be helpful in setting USDA agency program risk levels. See: http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2005_government_manual&docid=201944tx_xxx-30.pdf
7. Duties assigned in position descriptions determine the level of background investigation individuals must undergo. The cost of an investigation is directly related to position designation. Generally, the higher the designation level the more costly the investigation. Thus, where it would not affect the integrity and efficiency of a work unit, positions may be configured to concentrate responsibilities involving public trust and national security duties in fewer positions. When standard or identical position descriptions are used program managers may choose to select a uniform position designation for these positions.
8. Too high a designation may result in unnecessary background investigation costs and reporting of employee personal information. Likewise, too low a designation may create unnecessary risks to program integrity or national security. Thus sound judgment must be used when designating positions.
9. Contractors and non-employee affiliates background investigation requirements for USDA Personal Identity Verification (PIV) I.D. badges should be determined using OPM or agency position designation guidance. USDA PIV ID badges are required by Homeland Security Presidential Directive 12, Policy for a Common Identification Standard for Federal Employees and Contractors.
10. Designation of information technology positions shall be consistent with Departmental Manual 3500, Chapter 9, Personnel Security, issued by the Office of the Chief Information Officer.
11. The attached OPM material is "For Official Use Only" and will not be posted on the PDSD website.

PDSD Actions: PDSD will continue to (1) conduct annual position designation training, (2) provide advisory opinions when requested by management, and (3) review designations and security clearances to ensure designations are proper and that the need for access is demonstrated or foreseeable.

Further Information: Contact Susan Gulbranson at susan.gulbranson@usda.gov or Marty Brumback at martin.brumback@usda.gov, for questions on position designation.

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Attachments